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January 23, 2020

**Via ECF**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *In re: J.P. Morgan Stable Value Fund ERISA Litigation,*  
*Master File No. 12-cv-02548-VSB***

Dear Judge Broderick,

Settling Plaintiffs and the Class, through their counsel undersigned below, request that the Court enter an order to have the Settlement Administrator, JND, direct the Escrow Agent, J.P. Morgan Corporate & Investment Bank—Escrow Services, to transfer the remaining amount in the Qualified Settlement Fund (“QSF”) to an interest-bearing account specified by JND with Signature Bank. This transfer is requested to facilitate final payments to class members and for payment of remaining settlement expenses, with all future distributions of the QSF to be made from that Signature Bank account.

The Settling Plaintiffs and the Class make this request pursuant to section 5.4 of the Settlement Agreement, which allows the Settlement Administrator to disburse a portion of the QSF as provided “in an order of the Court.”

As of December 31, 2019, the QSF has \$45,680,585.66. It is estimated that the following amounts will be disbursed from the QSF (through Signature Bank) under the Plan of Allocation:

<b>Current Amount in QSF</b>	<b>\$45,680,585.66</b>
JND Fees	-\$1,286,981.46
Estimated Plan/Plan Recordkeeper Fees	-\$100,000.00
<b>Amount in QSF After Fees</b>	<b>\$44,293,604.20</b>
1% Reserve Fund	-\$442,936.04
<b>Net Settlement Amount To Be Paid to Class Members</b>	<b>\$43,850,668.16</b>

Any remaining amount shall be distributed in accord with section 6.13 of the Settlement Agreement.

As of January 23, 2020, JND continues to project that the distribution of the Net Settlement Amount will be made to the Class in February 2020, consistent with the terms of the Settlement and with no extension being necessary.

Defendants take no position regarding this request, including on the amount or reasonableness of the underlying fees identified.

Respectfully submitted,

*/s/ Michael M. Mulder*

Michael M. Mulder, Co-Lead Class Counsel

cc: All counsel of record (via ECF)